

1 ROGER L. GRANDGENETT II, ESQ., Bar # 6323
2 HILARY B. MUCKLEROY, ESQ., Bar # 9632
3 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: rgrandgenett@littler.com
Email: hmuckleroy@littler.com

6 Attorneys for Defendant
7 UNITED AIRLINES, INC.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10
11 PETER SLACK, an Individual,
12 Plaintiff,

13 vs.

14 UNITED AIRLINES, INC., a Foreign
15 Corporation, DOES I-X; and ROE
16 CORPORATIONS I-X,
17 Defendant.

Case No. 2:18-cv-00899-GMN-CWH

**[PROPOSED] STIPULATION AND ORDER
TO EXTEND STAY IN DISCOVERY**

[SECOND REQUEST]

18 Plaintiff Peter Slack (“Plaintiff”) and Defendant United Airlines, Inc. (“Defendant”), by and
19 through their respective attorneys hereby stipulate to and request that the Court grant an extension to
20 the stay in discovery (currently set to expire on March 19, 2019) pending a decision on Defendant’s
21 Motion to Dismiss [ECF No. 9] and Plaintiff’s Motion to Amend [ECF No.14] or up to and
22 including, Wednesday, June 19, 2019.

23 The parties request an extension for a stay in discovery to avoid unnecessarily incurring the
24 significant costs and fees associated with any duplicative and/or over-expansive discovery that may
25 result if discovery is to continue at this point prior to clarification on the pleadings. Specifically, the
26 parties require a ruling on Defendant’s Motion to Dismiss [ECF No. 9] and Plaintiff’s Motion to
27 Amend [ECF No. 14] to know what claims may exist at this stage of the litigation and in order to
28 evaluate what additional discovery, of any, is necessary. For example, the parties cannot

1 meaningfully depose any witnesses without knowing what claims are and/or are not a part of this
2 lawsuit.

3 The requested stay is only to extend discovery and remaining case deadlines and not to any
4 briefing currently on file with the Court, including, but not limited to, Defendant's Motion to
5 Dismiss [ECF No. 9] and Plaintiff's Motion to Amend [ECF No. 14]. The parties maintain their
6 arguments with respect to all such motions. Accordingly, the parties request that the discovery stay
7 be extended pending a decision on Defendants' Motion to Dismiss [ECF No. 9] and Plaintiff's
8 Motion to Amend [ECF No. 14] or up to and including Wednesday, June 19, 2019.

9 Dated: March 12, 2019

Dated: March 12, 2019

10 Respectfully submitted,

Respectfully submitted,

11
12 /s/ Jenny L. Foley, Esq.

13 JENNY L. FOLEY, Ph.D., ESQ.
HKM EMPLOYMENT ATTORNEYS LLP

14 Attorney for Plaintiff
15 PETER SLACK

/s/ Hilary B. Muckleroy, Esq.

16 ROGER L. GRANDGENETT II, ESQ.
17 HILARY B. MUCKLEROY, ESQ.
18 LITTLER MENDELSON, P.C.

19 Attorneys for Defendant
20 UNITED AIRLINES, INC.

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated: March 26, 2019, 2019.

24
25 
26 UNITED STATES MAGISTRATE JUDGE

27 FIRMWIDE:163000001.1 087218.1029
28